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Attorneys for Defendants
IRICO GROUP CORP. and
IRICO DISPLAY DEVICES CO., LTD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

) Case No. 3:07-cv-05944-JST

) MDL No.: 1917

THIS DOCUMENT RELATES TO:

ALL DIRECT PURCHASER ACTIONS

) **DECLARATION OF STUART C.**
) **PLUNKETT IN SUPPORT OF**
) **OPPOSITION TO DIRECT**
) **PURCHASER PLAINTIFFS' MOTION**
) **TO COMPEL DISCOVERY**
) **RESPONSES FROM THE IRICO**
) **DEFENDANTS**

) **Date: May 10, 2018**

) **Time: 2:00pm**

) **Judge: Hon. Jon S. Tigar**

) **Courtroom: 9**
)

1 I, Stuart C. Plunkett declare as follows:

2 1. I am an attorney admitted to practice law in this Court and in the State of
3 California, and am a partner with the law firm of Baker Botts L.L.P., which represents
4 Defendants Irico Group Corporation and Irico Display Devices Co., Ltd. ("Irico Defendants").
5 I make this Declaration based on my personal knowledge and in support of the Opposition to
6 Direct Purchaser Plaintiffs' Motion to Compel Discovery Responses from the Irico Defendants.

7 2. On March 5, 2018, DPPs served jurisdictional discovery on Defendants.
8 Attached hereto as Exhibits A and B are true and correct copies of DPP's First Set of
9 Interrogatories and First Set of Requests for Production of Documents.

10 3. On April 9, 2018, DPPs sent a letter to Irico seeking to meet and confer
11 regarding the scheduling of 36 depositions. Attached hereto as Exhibit C is a true and correct
12 copy of the DPP's letter.

13 I declare under penalty of perjury that the foregoing is true and correct. Executed this
14 10th day of April 2018 in San Francisco, California.

15
16 /s/ Stuart C. Plunkett

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